



MICHAEL ROWE  
(612) 492-6724  
rowe.michael@dorsey.com

January 23, 2025


Plaintiff's request for leave to file an omnibus reply  
brief with a 30,000 word limit in opposition to  
Defendants' pending motions to dismiss is GRANTED.

**VIA ECF FILING**

The Honorable Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Dated: January 24, 2025  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
United States District Judge

Re: *Orient Plus International, Limited, et al., v. Baosheng Media Group Holdings, Limited, et al.*, Case No. 1:24-cv-744

Dear Judge Rochon,

I represent Plaintiffs Orient Plus International Limited, Union Hi-Tech Development Limited, and Golden Genius International Limited ("Plaintiffs") in the above-captioned matter. In conformance with Paragraph 1(A) of this Court's Individual Rules of Practice, I write to seek leave for Plaintiffs to file an omnibus reply brief with a 30,000-word limit in opposition to Defendants' pending motions to dismiss.

On December 20, 2024, Defendants filed five motions to dismiss Plaintiffs' Third Amended Complaint (ECF Nos. 136, 137, 140, 141, 146). The memoranda in support of these motions totaled 40,326 words and approximately 163 pages. Pursuant to the Local Rules and the Court's Individual Rules of Practice in Civil Cases, Plaintiffs are permitted to respond separately to each of the five motions to dismiss, with a word limit of 8,750 words for each opposition brief. But in the spirit of judicial efficiency for the Court and litigants, Plaintiffs propose filing a single, omnibus opposition brief rather than five separate briefs. As such, Plaintiffs respectfully request permission to file an omnibus opposition of up to 30,000 words. Plaintiffs' request is aligned with motions this Court has previously granted in similar situations. See *In Re Lottery.Com, Inc. Sec. Litig.*, 22-CV-7111, ECF No. 183 (July 26, 2024).

Counsel for Plaintiffs solicited Defendants' position on January 21. Plaintiffs initially proposed filing a single brief with a 32,500-word limit. Counsel for the two auditors, on behalf of all Defendants, agreed to an omnibus brief but insisted on a 17,500-word limit. Plaintiffs rejected the counterproposal, but in an attempt to compromise, proposed a 30,000-word limit. Counsel for the Underwriters (Univest Securities, LLC; The Benchmark Company, LLC; and WestPark Capital, Inc.), Auditors (Friedman LLP and Marcum LLP), and Baosheng Media Group Holdings Limited do not oppose a 30,000-word limit but reserve their rights regarding a word limit for their



January 23, 2025  
Page 2

respective reply briefs. Although Plaintiffs also solicited the position of the Individual Defendants (Wenxiu Zhong; Sheng Gong; Yu Zhong; Zuohao Hu; Adam (Xin) He; Yue Jin; Yanjun Hu), those Defendants did not provide their position at the time of this filing.

Sincerely,

s/ Michael Rowe  
Michael Rowe

cc: All Counsel of Record (via ECF)